



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

KTF/RTP/VAZ/EWS  
F. #2015R00747

271 Cadman Plaza East  
Brooklyn, New York 11201

January 11, 2023

By E-mail and ECF

The Honorable Pamela K. Chen  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Full Play Group, SA, et al.  
Criminal Docket No. 15-252 (S-3) (PKC)

Dear Judge Chen:

The government writes in further response to the stipulation proposed by defendants Hernan Lopez and Carlos Martinez regarding the News of the World Scandal (the "NOTW Scandal"). See ECF No. 1873. The parties jointly propose that, in lieu of testimony introducing background information about the NOTW Scandal, the Court should instruct the jury as follows:<sup>1</sup>

I have decided that it might be useful to provide you some background to the testimony you are hearing and may hear later in the trial on this topic, and to that end the parties have agreed as follows: In July 2011, it was publicly reported that employees of a newspaper in the United Kingdom called 'News of the World' had engaged in phone hacking and other improper activities, including bribery of police officials, in the pursuit of stories. News of the World was owned by News Corp., which at the time also owned Fox, including Fox International Channels. In the Fall of 2011, News Corp. publicly announced its intention to implement certain corporate reforms, including enhanced compliance and anti-bribery policies and procedures, across all of News Corp.'s businesses, including Fox International Channels. Hernan Lopez and Carlos

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<sup>1</sup> Notwithstanding their agreement with the language of the proposed jury instruction, the defendants continue to object to the admission of evidence concerning the NOTW Scandal.

Martinez had no involvement with News of the World or its activities.

During trial, the government will alert the Court before it intends to elicit information about the NOTW Scandal for the first time so the Court can provide this proposed instruction as appropriate.

Moreover, as noted in the government's December 14, 2022 letter, see ECF No. 1876, the government understands this stipulation serves to avoid questioning witnesses on the prejudicial details of the NOTW Scandal. The government intends to question witnesses about the enhanced compliance and anti-bribery measures that were introduced at News Corp. following the NOTW Scandal, as well as any discussions among the defendants and the witnesses about the scandal and the contributing effect it had on the defendants' conduct.

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/  
Kaitlin T. Farrell  
Robert T. Polemeni  
Victor Zapana  
Eric Silverberg  
Assistant U.S. Attorneys  
(718) 254-7000

cc: Clerk of Court (PKC) (by ECF)  
Counsel of record (by ECF)